

MARK J. BENNETT 2672  
Attorney General of Hawai'i

JAMES E. HALVORSON 5457  
NELSON Y. NABETA 3004  
Deputy Attorneys General  
Department of the Attorney  
General, State of Hawai'i  
235 South Beretania Street, 15<sup>th</sup> Floor  
Honolulu, Hawai'i 96813  
Telephone: (808) 587-2900  
Facsimile: (808) 587-2965  
Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

ROBERT SHEREZ,

Plaintiff,

vs.

STATE OF HAWAII DEPARTMENT  
OF EDUCATION; PATRICIA  
HAMAMOTO, Superintendent of  
Hawai'i Schools, MEREDITH  
MAEDA, Principal, Castle High  
School; SARA GRONNER OR  
GRONNA, Vice Principal of Castle  
High School,

Defendants.

CIVIL NO. 04-00390 JMS-KSC

DEFENDANTS' OBJECTIONS TO  
ADMISSIBILITY OF PLAINTIFF'S  
EXHIBITS; CERTIFICATE OF  
SERVICE

**DEFENDANTS' OBJECTIONS TO  
ADMISSIBILITY OF PLAINTIFF'S EXHIBITS**

Defendants, by and through his undersigned attorneys, pursuant to this Court's Amended Rule 16 Scheduling Order, hereby submit their objections to the admissibility of Plaintiff's exhibits and request that they be excluded at trial.

Plaintiff's Exhibit No.	Description of Document	Objection
1	Letter from Richard Furmark dated March 14, 2003	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion and improper disclosure of student information.
2	Letter from Ira Ilson May 24, 2002	Lack of authentication, hearsay, relevancy, improper character evidence cumulative and improper opinion.
3	Letter from Candace Sullivan dated November 3, 2004	Lack of authentication, cumulative and hearsay.
4.	Letter to Donald Yee from Dr. Walter Sand dated August 8, 1989	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion cumulative and improper disclosure of student information.
5	Letter from Jean Peters dated November 10, 1999	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, cumulative and improper disclosure of student information.

6	Letter Claire Vericker dated January 26, 1991	Lack of authentication and hearsay.
7	Letter from Patrick Clemente dated May 26, 2001	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, cumulative and improper disclosure of student information.
8	Letter from Andre Penon dated April 8, 1999	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion and improper disclosure of student information.
9.	Letter from Tom Tasato dated March 4, 1991	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, cumulative and improper disclosure of student information.
10	Letter from Scott Kaneko dated February 21, 1991	Lack of authentication and hearsay.
11	Letter from William Murphy	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, cumulative and improper disclosure of student information.
12	Letter from David Wilson	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.

13	Letter from Ann Kawaguchi dated June 8, 1989; Letter from Sakae Loo dated June 26, 1989.	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
14	Letter from Fran Jorgensen dated September 10, 1993	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
15	Letter from Kirk Kama dated November 11, 1999	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
16	Letter from Stanley Seki dated March 2, 1991	Lack of authentication and hearsay.
17	Letter from John Linskey dated February 26, 1991	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
18	Certificate of Requirements	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
19	Employment Security Appeals: Notice of Hearing date October 12, 2004	Lack of authentication, hearsay, relevancy.
20	Letter from Plaintiff to Home Hospital Tutoring dated February 25, 2005	Lack of authentication, hearsay, relevancy.
21	Letter from DOE to Unemployment Office appealing decision dated July 22, 2004	Lack of authentication, hearsay, relevancy.

22	Plaintiff's work resume	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
23	ETS Recognition Certificate	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
24	DOE Record of Conference	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
25	Hawaii Civil Rights Commission letter dated February 9, 2004	Lack of authentication and hearsay.
26	Hawaii Civil Rights Commission letter dated March 25, 2004	Lack of authentication and hearsay.
27	Unemployment Office Eligibility Review dated September 8, 2004	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
28	Hawaii Civil Rights Commission Pre-Complaint Questionnaire dated June 10, 2003	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
29	Hawaii Civil Rights Commission Charge of Discrimination dated August 5, 2003	Lack of authentication and hearsay.
30	EEOC Right to Sue dated May 3, 2004	Lack of authentication and hearsay.

31	Letter from Mr. Won dated February 18, 2005	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
32	Statement by Dagmar Suzuki dated December 4, 2004	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
33	Letter from Marty Mattison dated February 8, 2006	Lack of authentication and hearsay.
34	Statement from Ira Ilson dated May 24, 2002	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
35	DOE record of conference dated April 2, 1991	Lack of authentication, hearsay, relevancy, improper character evidence and improper opinion.
36	Eligibility Review, September 8, 2004	Lack of authentication, hearsay, relevancy, improper character evidence and improper opinion.
37	Individual Sick Slip dated November 10, 1999.	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
38	Ambulance Report dated November 10, 1999	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.

39	Letter from the American Red Cross dated February 25, 1988	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
40	Substitute Teacher Observation and Evaluation Report dated March 26, 1991	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
41	Notifications of Employment Status	Lack of authentication, hearsay, relevancy.
42	DOE Certificated Employee Notification of Personnel Action as substitute teacher	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
43	Kamehameha Schools ABSI staff letter dated March 4, 1991	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
44	Letter from the Young Democrats of Hawaii dated September 2, 1999	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
45	Letter from Donna Fish dated February 25, 1991	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
46	DOE credential issued December 2, 1999	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.

47	Letter that is unsigned and undated	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
48	Letter from Thomas Schubelka dated November 11, 1989	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
49	Letter from American Red Cross that is not dated	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, and cumulative.
50	Letter from Regina Quimpo dated December 14, 1987	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, improper disclosure of student information and cumulative.
51	Letter from Department of Labor and Industrial Relations Unemployment Insurance Division dated August 29, 2005	Lack of authentication, hearsay, relevancy, improper character evidence and improper opinion.
52	Court Order Granting in Part and Denying in Part Plaintiff's Motion to Compel	Relevancy.
53	Defendant's First Amended Response to Plaintiff's First Request for Production of Documents	Relevancy.



54	Defendant's Response to Plaintiff's First Request for Production of Documents	Relevancy.
55	Defendant's Response to Plaintiff's First Request for Answers to Interrogatories	Relevancy.
56	Letter from AJ and Mary Bassett dated September 1, 2005	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion, improper disclosure of student information and cumulative.
57	Notification of Employment Status	Lack of authentication, hearsay, relevancy, improper character evidence, improper opinion and cumulative.

DATED: Honolulu, Hawai'i, March 13, 2007.

/s/ NELSON Y. NABETA  
NELSON Y. NABETA  
Deputy Attorney General